UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

Ronald Marquez, Plaintiff, v. JIDD Motors, Inc., Defendant.	Civil Action No.: ______ **COMPLAINT**

For this Complaint, Plaintiff, Ronald Marquez, by undersigned counsel, states as follows:

JURISDICTION

1. This action arises out of Defendant's violation of the Fair Credit Reporting Act, 15 U.S.C. § 1681, *et seq*. (the "FCRA").

2. Venue is proper in this District pursuant to 28 U.S.C. § 1391(b), in that Defendant transacts business here and a substantial portion of the acts giving rise to this action occurred here.

PARTIES

3. Plaintiff, Ronald Marquez ("Plaintiff"), is an adult individual residing in Brookfield, Illinois, and is a "consumer" as that term is defined by 15 U.S.C. § 1681a(c).

4. Defendant, JIDD Motors, Inc. ("JIDD"), is an Illinois business entity with a principal place of business in Des Plaines, Illinois. JIDD obtains consumer credit information from consumer credit reporting agencies in connection with financing for automobile purchases.

FACTUAL ALLEGATIONS

5. In February 2016, Plaintiff went to JIDD in order to purchase a vehicle.

6. At that time, Plaintiff had already obtained financing for the vehicle through a

local credit union.

7. Plaintiff brought the paperwork from the credit union to JIDD and explicitly told JIDD that he did not want his credit report accessed by JIDD or other potential creditors.

8. Thereafter, Plaintiff checked his credit report and found that JIDD accessed his credit report and also allowed half a dozen other creditors to do the same.

9. Plaintiff did not provide JIDD with consent to obtain his credit report or to cause other companies to obtain his credit report for any purpose.

10. As such, JIDD did not access Plaintiff's credit for a permissible purpose.

COUNT I
VIOLATIONS OF THE FAIR CREDIT REPORTING ACT
15 U.S.C. § 1681, *et seq.*

11. Plaintiff incorporates by reference all of the above paragraphs of this Complaint as though fully stated herein.

12. 15 U.S.C. §1681b permits access to consumer reports for several specific, enumerated permissible purposes.

13. Defendant obtained Plaintiff's credit report without permissible purpose, in violation of 15 U.S.C. §1681b(f).

14. Defendant caused other companies to obtain Plaintiff's credit report without permissible purpose, in violation of 15 U.S.C. §1681b(f).

15. As a result of Defendant's violation of § 1681b(f) Plaintiff is entitled to damages, costs and attorney's fees pursuant to 15 U.S.C. §1681n(a).

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully prays that judgment be awarded in Plaintiff's favor and against Defendant as follows:

1. Statutory damages pursuant to 15 U.S.C. § 1681n(a)(1)(B);

2. Punitive damages pursuant to 15 U.S.C. § 1681n(a)(2);

3. Attorney's fees and costs pursuant to 15 U.S.C. § 1681n(a)(3); and

4. Granting Plaintiff such other and further relief as may be just and proper.

TRIAL BY JURY DEMANDED ON ALL COUNTS

Dated: April 6, 2017

Respectfully submitted,

By /s/ Sergei Lemberg

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